

J. Ashley Cooper Partner

Telephone: 843.727.2674 Direct Fax: 843.727.2680 ashleycooper@parkerpoe.com Atlanta, GA
Charleston, SC
Charlotte, NC
Columbia, SC
Greenville, SC
Raleigh, NC
Spartanburg, SC
Washington, DC

June 30, 2020

VIA HAND DELIVERY

Jocelyn G. Boyd Chief Clerk/Administrator **Public Service Commission of South Carolina** Post Office Drawer 11649 Columbia, SC 29211 Re: Filing of Direct Testimony and Request for Confidential Treatment - Petition of Bridgestone Americas Tire Operations, LLC for an Order Compelling Dominion Energy South Carolina, Inc. to Allow the Operation of a 1980 kW AC Solar Array

Docket No. 2020-63-E

Dear Ms. Boyd:

Dominion Energy South Carolina, Inc. ("<u>DESC</u>") hereby files with the Public Service Commission of South Carolina (the "<u>Commission</u>"), in the above-referenced docket, direct testimony of the following:

- 1. Mark C. Furtick;
- 2. Joseph L. Hodges;
- 3. John H. Raftery; and
- 4. Pandelis N. Xanthakos.

However, due to the commercially sensitive and proprietary nature of certain information contained in the respective testimony of DESC Witness Furtick and DESC Witness Hodges, as well as the highly competitive nature of the industry in which DESC operates, DESC respectfully requests that the Commission find that the testimony of DESC Witness Furtick and DESC Witness Hodges contains protected information and issue a protective order barring the disclosure of such testimony under the Freedom of Information Act, S.C. Code Ann. §§ 30-4-10 et seq., S.C. Code Ann. Regs. 103-804(S)(1), or any other provision of law. Pursuant to S.C. Code Ann. Regs. 103-804(S)(2), the determination of whether a document may be exempt from disclosure is within the Commission's discretion.

To this end, and in accordance with Commission Order No. 2005-226, dated May 6, 2005, in Docket No. 2005-83-A, we enclose with this letter a redacted version of the respective

testimony of DESC Witness Furtick and DESC Witness Hodges that protects from disclosure the sensitive, proprietary, and commercially-valuable information, while making available for public viewing the non-protected information. We also enclose unredacted copies of the testimony of DESC Witness Furtick and DESC Witness Hodges in separate, sealed envelopes and respectfully request that, in the event that anyone should seek disclosure of either unredacted version, the Commission notify DESC of such request and provide it with an opportunity to obtain an order from this Commission or a court of competent jurisdiction protecting such testimony from disclosure.

Enclosed are the following:

- True and correct copies of the original respective testimony of DESC Witness Furtick and DESC Witness Hodges in sealed envelopes marked "CONFIDENTIAL." Each page of the testimony is also marked "CONFIDENTIAL."
- 2. Ten (10) copies of redacted versions of the respective testimony of DESC Witness Furtick and DESC Witness Hodges for filing and public disclosure.

By copy of this letter, we are serving the parties of record with a copy of DESC's direct testimony and attach a certificate of service to that effect. Additionally, DESC will make the original, unredacted copies of such testimony available to the Office of Regulatory Staff for its review upon request. If you have any questions, please do not hesitate to contact me.

Sincerely,

J. Ashley Cooper

JAC:hmp Enclosures

cc: (Via Electronic Mail and First Class Mail)

Scott Elliott, Esquire

J. Blanding Holman, IV, Esquire Alexander W. Knowles, Esquire Katherine Nicole Lee, Esquire

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2020-63-E

IN RE:)
Petition of Bridgestone Americas Tire Operations, LLC for an Order Compelling Dominion Energy South Carolina, Inc. to Allow the Operation of a 1980 kW AC Solar Array	CERTIFICATE OF SERVICE CERTIFICATE OF SERVICE

This is to certify that I have caused to be served on this day one (1) copy of **Dominion Energy South Carolina**, Inc.'s direct testimony of Mark C. Furtick, Joseph L. Hodges, John H. Raftery, and Pandelis N. Xanthakos via electronic mail and U.S. First Class Mail upon the persons named below, addressed as follows:

J. Blanding Holman, IV, Esquire SOUTHERN ENVIRONMENTAL LAW CENTER

525 East Bay Street Charleston, SC 29403 Email: <u>bholman@selcsc.org</u>

Alexander W. Knowles, Esquire

OFFICE OF REGULATORY STAFF

1401 Main Street, Suite 900 Columbia, SC 29201

Email: aknowles@ors.sc.gov

Katherine Nicole Lee, Esquire

SOUTHERN ENVIRONMENTAL LAW CENTER

525 East Bay Street Charleston, SC 29403 Email: klee@selcsc.org

Scott Elliott, Esquire

ELLIOTT & ELLIOTT, P.A.

1508 Lady Street Columbia, SC 29201

Email: selliott@elliottlaw.us

s/ J. Ashley Cooper	